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REMARKS

Claims 1-24 and 26-30 are currently pending in the subject application and are presently under consideration. Claims 1, 20, 29, and 30 have been amended herein to clarify the claims so as to expedite favorable prosecution of the application and alternatively to place the application in a better form for appeal. A complete listing of the claims in revised amendment format can be found at pages 2-11.

Applicants' representative notes with appreciation the indication that claims 17 and 19 contain allowable subject matter and would be allowable if rewritten in independent form including all the limitations of the base claim and any intervening claims. Nevertheless, it is believed such amendments are not necessary in view of the below-noted novel aspects of the invention as recited in the independent claims vis-à-vis the cited art.

Favorable reconsideration and allowance of the subject patent application is respectfully requested in view of the amendments and comments below. In the event the Examiner chooses not to allow the subject application, applicants' representative respectfully requests entrance of the above amendments for purposes of an appeal.

I. Rejection of Claims 1, 20, 21, 23, 25, 26, 29, and 30 under 35 U.S.C. § 102(b)

Claims 1, 20, 21, 23, 25, 26, 29, and 30 are rejected under 35 U.S.C. § 102(b) as being anticipated by Greger Lindén, "Structured Document Transformations," 1997, University of Helsinki, Finland, Series of Publications A, Report A-1997-2 (hereinafter Lindén). Withdrawal of this rejection is respectfully requested for at least the following reasons.

Withdrawal of this rejection is required because the cited reference, Lindén, fails to disclose, teach, or suggest all the claimed limitations of the present invention.

For a prior art reference to anticipate, 35 U.S.C. §102 requires that "*each and every element as set forth in the claim is found*, either expressly or inherently described, *in a single prior art reference*." *In re Robertson*, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950 (Fed. Cir. 1999) (quoting *Verdegaal Bros., Inc. v. Union Oil Co.*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)) (emphasis added). "*The identical invention must be shown in as complete detail as is contained in the ... claim*." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989) (emphasis added).

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As per claims 1, 20, 29, and 30, Lindén fails to disclose, teach, or suggest the following recited claim limitations: (i) *determining source node dependencies* for a target node by *tracing from the target node through a generically specified mapping* to the source schema, (ii) matching hierarchy by *generating a hierarchy match list* for the target node, and (iii) generating code according to the *hierarchy match list*. Rather, Lindén discloses a method for transferring data from one structured document or grammar to a different structured document or grammar by applying a complete set of formal production group association rules to a source document (tree) to produce a target document (tree). In contrast, the present invention, as claimed, discloses methods for generating and compiling mapping code from a generically specified mapping (*e.g.* visual representation of a map created by a user), which can later be executed in a manner similar to Lindén to transfer data from a source document to a target document. However, Lindén is not concerned with generating or compiling code from a generic mapping at least because it teaches completely specifying formal group association rules. Thus, there is no need to trace back from a target node through a mapping to determine source node dependences as they are already formally specified in complex production group association rules. It should be noted that one object of the subject invention is to provide an improved tool which allows mappings to be specified and generated by novices or ordinary business personal who are not familiar with grammars and other formal software programming languages or techniques. (*See* page 3, lines 14-22, and page, 4, lines 2-6). In accordance therewith, the claimed methodology of the subject invention generates and compiles mapping code from a generically specified mapping (*e.g.*, graphical representation of a map- *See* Fig. 11).

Furthermore, the mere fact that Lindén discloses that a target hierarchical parse tree is created by a source-to-target mapper (pointed out by the Examiner), does not disclose, teach, or suggest generating a hierarchy match list for each target node and generating code according to a hierarchy match list.

In light of the above, claims 1, 20, 29, and 30 are allowable at least because Lindén fails to disclose each and every element as set forth in the claims.

Claims 21, 23, and 26 depend from claim 20. By virtue of their dependency, claims 21, 23, and 26 contain all the limitations of claim 20. Claim 20 is allowable for the reasons discussed *supra*. Therefore, claims 21, 23, and 26 are allowable for at least the same reasons.

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II. Rejection of Claims 2 and 16 under 35 U.S.C. § 103(a)

Claims 2 and 16 Under 35 U.S.C. § 103(a) as being unpatentable over Lindén in view of Alfred V. Aho, *et al.* "Compilers" Principles, Techniques, and Tools," 1986, Addison-Wesley (hereinafter Aho, *et al.*). Withdrawal of this rejection is respectfully requested for at least the following reason.

Claims 2 and 16 depend directly or indirectly from independent claim 1. Aho, *et al.* does not make up for the aforementioned deficiencies with respect to claim 1. Accordingly, this rejection should be withdrawn.

III. Rejection of Claims 18 and 28 under 35 U.S.C. § 103(a)

Claims 18 and 28 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Lindén in view of Alberto Bellina, "XmlTool documentation," 21 January 2003 (hereinafter Bellina). Withdrawal of this rejection is respectfully requested for at least the following reason.

Claims 18 and 28 respectfully depend from independent claims 1 and 20, respectively. Bellina does not make up for the deficiencies of Lindén with respect to claims 1 and 20. Therefore, this rejection should be withdrawn.

IV. Rejection of Claim 27 under 35 U.S.C. § 103(a)

Claim 27 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Lindén. Withdrawal of this rejection is respectfully requested for at least the following reason. Claim 27 depends from independent claim 20. By virtue of its dependency, claim 27 contains all the limitations of claim 20. Claim 20 is allowable for at least the above discussed reasons. Therefore, claim 27 is allowable the same reasons.

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CONCLUSION

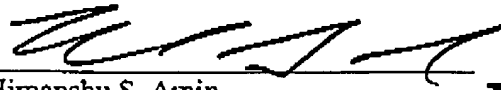
The present application is believed to be in condition for allowance in view of the above clarifying amendments and comments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,

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